

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

In Re:)	
CHAMPAGNE SERVICES, LLC)	
)	Case No. 16-11683-RGM
Debtor)	Chapter 11
)	
)	

**MOTION TO EXTEND TIME TO FILE CERTIFICATE OF CHAPTER 11
SMALL BUSINESS PLAN AND DISCLOSURE STATEMENT**

COMES NOW the Debtor, Champagne Services, LLC, by and through counsel, Whitney Lawrimore Hughes of Westlake Legal Group, and respectfully move this Honorable Court for an Order extending Debtor's time to file its Chapter 11 Small Business Plan and Disclosure Statement. In support thereof, Debtors state as follows:

1. A Voluntary Petition for Bankruptcy was filed on May 5, 2016.
2. An Order for Relief was then entered on May 12, 2016.
3. Pursuant to 11 U.S.C. 1121, Debtor is required to file a Plan and Statement for Disclosure within 180 days of the Order for Relief. However, the Code contemplates an extension for a small business to file its plan and disclosure statement within 300 days of the Order for Relief.
4. The U.S. Trustee in this matter has indicated he is amenable to the extension of Debtor filing its plan and disclosure statement within 300 days.
5. The 300 day deadline is contemplated by the Code for small businesses.
6. The deadline to file within 180 days is not obtainable because Debtor's application to employ counsel has not yet been approved and because it is a small business needing time to establish a viable plan.

7. However, there is no indication that the plan will not be approved once Debtor has sufficient time to prepare it. Therefore, the plan will, more likely than not, be confirmed by the Court within the combined filing and confirmation timeline.

WHEREFORE, Debtor prays this Court will enter an Order permitting the extension of time to complete and to file the Chapter 11 Small Business Plan and Disclosure Statement to March 8, 2017; that this Motion be scheduled for hearing on October 18th, 2016 at 11:00 am before Judge Mayer; and for such other and further relief as this Honorable Court may deem just and proper.

Respectfully submitted,
Champagne Services, LLC
By Counsel

WESTLAKE LEGAL GROUP

/s/ Whitney Lawrimore Hughes
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Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that this 3rd day of September, 2016, true copies of the foregoing document were sent via first class mail and ECF to the Trustee:

Office of the United States Trustee
Region 4
115 S. Union Street, Suite 210
Alexandria, Virginia 20314

Can Capital Asset Servicing
155 North 400 West
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Salt Lake City, UT 84103-1111

Accord Business Funding
3730 Kirby Drive
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County of Loudoun Virginia
1 Harrison Street SE
1st Floor
Leesburg, Virginia 20175-3102

Internal Revenue Service
Centralized Insolvency Operations
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Philadelphia, PA 19101-7346

Loan Me
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Can Capital Asset Servicing
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/s/ Whitney Lawrimore Hughes
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